

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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BRANDON ALVES, et. al.

Plaintiffs,

-against-

DONNA M. MCNAMARA, et. al.,

Defendants.

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)  
) CIVIL ACTION NO.  
)  
)  
) **DECLARATION OF SAWANDI**  
) **CASELL IN SUPPORT OF**  
) **MOTION FOR INJUNCTIVE**  
) **RELIEF**  
)  
)  
)

I, Sawandi Cassell, hereby declare and state the following:

1. I reside in Chelsea, Suffolk County, Massachusetts.
2. I am currently a member of the Second Amendment Foundation.
3. I do not hold a firearms license issued in the Commonwealth of Massachusetts and I do not possess or have access to any firearms, rifles, shotguns or ammunition.
4. I am not prohibited from possessing firearms, rifles, shotguns or ammunition under Massachusetts or Federal law.
5. I wish to obtain a license to carry ("LTC") in order to obtain a firearm and ammunition to protect myself and my family should the need arise.
6. I submitted my application for an LTC to the Chelsea Police Department in mid-July. I have contacted the Chelsea Police Department numerous times over the past several months to check the status and no one will give me any information.
7. I contacted the Massachusetts Firearms Records Bureau and I was informed that the Chelsea Police Department has not even started my application.
8. In November, I went to the Chelsea Police Department and spoke with the Detective in charge of firearms licensing. I was told that there was a "whole pile of applications" and that mine was "probably in there somewhere".
9. I was told that it may be "up to a year" before my application will be processed.
10. Over 7 months has passed and I am still waiting for my application to be processed by the Chelsea Police Department.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed this 1st day of March, 2021.

  
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Sawandi Cassell

